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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR, *et al.*, individually
and behalf of all others similarly situated,

Plaintiffs,

v.

RIAD SALAMEH, *et al.*,

Defendants.

Civil Action No. 1:24-cv-05043-CPO-EAP

Hon. Christine P. O'Hearn, U.S.D.J.

Hon. Elizabeth A. Pascal, U.S.M.J.

**NOTICE OF MOTION OF DEFENDANTS DELOITTE LLP AND DELOITTE &
TOUCHE LLP TO DISMISS THE FIRST AMENDED CLASS ACTION COMPLAINT**

TO:

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*Attorneys for Plaintiffs and the Proposed
Classes*

PLEASE TAKE NOTICE that, on March 17, 2025, at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendants Deloitte LLP and Deloitte & Touche LLP, by and through their counsel, Kramer Levin Naftalis & Frankel LLP, shall move before the Honorable Christine P. O'Hearn, United States District Judge, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an Order pursuant to Federal Rules of Civil Procedure 8(a), 9(b), 12(b)(1), and 12(b)(6) dismissing with prejudice all claims and causes of action asserted against Deloitte LLP and Deloitte & Touche LLP in Plaintiffs' First Amended Class Action Complaint (ECF Doc. No. 3), and granting such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Deloitte LLP and Deloitte & Touche LLP shall rely on the accompanying memorandum of law, the declaration of Boaz I. Cohen, including the exhibits thereto, the papers on file in this action, and all other matters properly before the Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation for an Extension of Time to File, and a Briefing Schedule for, Motions to Dismiss the First Amended Class Action Complaint, So Ordered by the Court (ECF Doc. No 17), any answering papers shall be filed on or before January 27, 2025, and any reply papers shall be filed on or before February 25, 2025.

PLEASE TAKE FURTHER NOTICE that a Proposed Order and a certificate attesting to the date and manner of service of these moving papers are submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested unless the Court grants the motion on the basis of the papers submitted.

Dated: November 26, 2024

Respectfully submitted,

KRAMER LEVIN NAFTALIS & FRANKEL LLP

s/ Boaz I. Cohen

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